



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
**SUBPOENA**  
 SUPERIOR COURT

☒ PROVIDENCE/BRISTOL    ☐ KENT    ☐ WASHINGTON    ☐ NEWPORT

|   |  |
|---|--|
| 1. IN RE: THE STATION FIRE IN WEST WARWICK<br>VS. | 2. CASE NO. MP NO. 03-1326<br>MP NO. 03-1346<br>MP NO. 03-1431 |
|---|--|

McLaughlin & Moran, Inc.  
 TO 40 Slater Road, Cranston, RI 02920

☐ YOU ARE HEREBY COMMANDED to appear in the Superior Court for the above County on \_\_\_\_\_ to testify in the above entitled action [and bring with you: \_\_\_\_\_ DATE \_\_\_\_\_]

LOCATION OF COURT

COURTROOM#

DATE

TIME

☒ YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above entitled action.

COOLEY MANION JONES LLP  
 One Center Place, Providence, RI 02903  
 LOCATION OF DEPOSITION

AUGUST 14, 2003  
 11:00 a.m.  
 DATE AND TIME

☒ YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects):  
 SEE EXHIBIT A.

DOCUMENTS/OBJECTS  
 COOLEY MANION JONES LLP  
 One Center Place, Providence, RI 02903  
 LOCATION

AUGUST 14, 2003  
 DATE

ROOM#

11:00 a.m.  
 TIME

☐ YOU ARE COMMANDED to produce and permit inspection of the following premises at the date and time specified below.

LOCATION

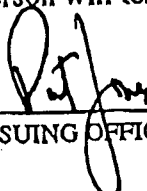
DATE

ROOM#

TIME

7/30/03  
 A True Copy of the  
 Michael F. Talbot  
 Michael F. Talbot  
 Constable # 6109

Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf and may set forth, for each person designated, the matters on which the person will testify. (Superior Court Rule of Civil Procedure, 30(b) 6).

  
 \_\_\_\_\_  
 ISSUING OFFICER SIGNATURE

7/28/03  
 \_\_\_\_\_  
 DATE

ATTORNEY FOR: ☒ Plaintiff ☐ Defendant

|                                      |                   |                |              |
|--------------------------------------|-------------------|----------------|--------------|
| <u>Patrick T. Jones</u>              |                   | 6636           |              |
| ISSUING OFFICER'S NAME (Print/Typed) |                   | REGISTRATION # |              |
| <u>One Center Place</u>              | <u>Providence</u> | <u>RI</u>      | <u>02903</u> |
| STREET                               | CITY/TOWN         | STATE          | ZIP          |

### PROOF OF SERVICE

|       |       |
|-------|-------|
| _____ | _____ |
| DATE  | PLACE |

### SERVED

|                        |                   |
|------------------------|-------------------|
| _____                  | _____             |
| SERVED ON (PRINT NAME) | MANNER OF SERVICE |
| _____                  | _____             |
| SERVED BY (PRINT NAME) | TITLE             |
| _____                  | _____             |

### DECLARATION OF SERVER

I declare under penalty of perjury that the foregoing information contained in the proof of service is true and correct.

Executed on \_\_\_\_\_  
 \_\_\_\_\_  
 DATE

\_\_\_\_\_  
 SIGNATURE OF SERVER

\_\_\_\_\_  
 ADDRESS OF SERVER

---

Rule 45, Superior Court Rules of Civil Procedure, Parts C & D

**(c) Protection of Persons Subject to Subpoenas.**

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction, which may include, but is not limited to, lost earnings and a reasonable attorney's fee.

(2)(A) A person commanded to produce and permit inspection and copying of designated books; papers, documents or tangible things or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of the subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy the materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to their person commanded to produce, move at any time for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an office of a party from significant expense resulting from the inspection and copying commanded.

(3)(A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it

- (i) fails to allow reasonable time for compliance;
- (ii) requires disclosure of privileged or other protected matter and no exception or waiver applies, or
- (iii) subjects a person to undue burden.

(B) If a subpoena

- (i) requires disclosure of a trade secret or other confidential research, development, or commercial information or
- (ii) requires disclosure of an unretained expert's opinion

or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonable compensated, the court may order appearance or production only upon specified conditions.

**(d) Duties in Responding to Subpoena.**

(1) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

(2) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

STATE OF RHODE ISLAND  
PROVIDENCE, SC.

SUPERIOR COURT

IN RE: THE STATION FIRE IN : M.P. NO. 03-1326  
WEST WARWICK : M.P. NO. 03-1346  
: M.P. NO. 03-1431

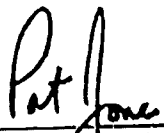
NOTICE TO TAKE DEPOSITION

DEPONENT: McLaughlin & Moran, Inc.  
40 Slater Road, Cranston, RI 02920

DATE: Thursday, August 14, 2003  
TIME: 11:00 a.m.

PLEASE TAKE NOTICE that pursuant to R.C.P. 26, the attorney for petitioners in the above-captioned matter will take the deposition of the above-named individual on oral examination, which examination will continue from day to day until completed, the same to commence on the date and time above stated at the offices of COOLEY MANION JONES LLP, One Center Place, Providence, Rhode Island, before a Notary Public duly commissioned in the State of Rhode Island.

PLEASE TAKE FURTHER NOTICE that a subpoena duces tecum will issue in the form annexed hereto.

  
Patrick T. Jones (6636)  
COOLEY MANION JONES LLP  
One Center Place  
Providence, RI 02903  
(401) 273-0800

DATED: July 28, 2003

McLaughlin & Moran

SCHEDULE "A"

1. All documents which refer or relate to McLaughlin & Moran's authority to act as distributor or agent for Anheuser-Busch as of February 20, 2003 including without limitation all distribution agreements and other similar contracts.
2. All instructions, guidelines and/or protocols in effect as of February 20, 2003 provided by Anheuser-Busch to McLaughlin & Moran relating to McLaughlin & Moran's distribution of Anheuser-Busch products and the use of Anheuser-Busch's name or logo, or the name or logo of its products, in connection with the sponsorship or promotion of concerts or events.
3. All documents in the custody or control of McLaughlin & Moran in existence as of February 20, 2003 which refer or relate to the Great White concert of February 20, 2003.
4. All documents in the custody or control of McLaughlin & Moran which refer or relate to concerts or events at The Station after January 1, 2000 and prior to February 20, 2003.
5. All correspondence generated as of February 20, 2003 between McLaughlin & Moran and any person or entity relating to the Great White concert of February 20, 2003.
6. All contracts between McLaughlin & Moran and any person or entity which refer or relate to the Great White concert of February 20, 2003.
7. All documents which refer or relate to the production and/or shipment of Anheuser-Busch or Budweiser product to The Station on February 20, 2003.
8. All documents which memorialize or reflect any expense incurred by McLaughlin & Moran in connection with the Great White concert of February 20, 2003.
9. All documents which fully identify by name and address all employees or agents of McLaughlin & Moran who participated in any manner in the promotion of the Great White concert of February 20, 2003 including, without limitation, all employees or agents of McLaughlin & Moran who were present at The Station on February 20, 2003.
10. All documents which memorialize, reflect or condition the authority of McLaughlin & Moran or Anheuser-Busch to sponsor or promote the Great White concert of February 20, 2003.

11. All documents which refer or relate to McLaughlin & Moran's knowledge of Great White's use of pyrotechnics from 1995 to the present.
12. All contracts of indemnity to which McLaughlin & Moran is a party which may apply to claims arising out of the catastrophic fire at The Station on February 20, 2003.
13. All contracts of insurance which may respond to any claims asserted against McLaughlin & Moran arising out of the catastrophic fire at The Station on February 20, 2003.

CERTIFICATION

I hereby certify that on the 28<sup>th</sup> day of July, 2003, an exact copy of the within document was mailed to:

Thomas C. Angelone, Esq.  
Hodosh Spinnella & Angelone PC  
One Turks Head Place, Suite 1050  
Providence, RI 02903

Stephen E. Breggia, Esquire  
Breggia, Bowen & Grande  
395 Smith Street  
Providence, RI 02908-3734

Brian R. Cunha, Esq.  
Law Offices of Brian Cunha & Associates  
904 Broadway  
East Providence, RI 02914

Anthony F. DeMarco, Esq.  
Reynolds, DeMarco & Boland, Ltd.  
170 Westminster St., Suite 200  
Providence, RI 02903-2101

Marc DeSisto, Esquire  
DeSisto Law  
211 Angel Street  
P.O. Box 2563  
Providence, RI 02906-2563

Curtis R. Diedrich, Esq.  
Edward T. Hinchey, Esq.  
Sloane & Walsh, LLP  
3 Center Plaza  
Boston, MA 02108

Christopher C. Fallon, Jr., Esq.  
Cozen O'Connor  
1900 Market Street  
Philadelphia, PA 19103-3508

Joyce A. Faraone, Esq.  
400 Reservoir Ave., Suite 3G  
Providence, RI 02907-3565

William A. Filippo, Esq.  
Calvino Law Associates  
373 Elmwood Avenue  
Providence, RI 02907

James Howe, Esq.  
215 Broadway  
Providence, RI 02903

Scott Hubbell, Esq.  
Summers Law Office  
P.O. Box 306  
Franklin, MA 02038-0306

Stefanie Larivee-DiMarlo, Esq.  
215 Broadway  
Providence, RI 02903

Patrick C. Lynch, Attorney General  
Dept. of the Attorney General  
150 South Main Street  
Providence, RI 02903

Eva-Marie Mancuso, Esq.  
Hamel, Waxler, Allen & Collins  
387 Atwells Ave.  
Providence, RI 02909

Mark S. Mandell, Esq.  
Yvette M. Bolsclair, Esq.  
Mandell, Schwartz & Bolsclair, Ltd.  
One Park Row  
Providence, RI 02903

Daniel P. McKiernan, Esq.  
146 Westminster Street  
Providence, RI 02903

Donald A. Migliori, Esq.  
Motley Rice, LLC  
321 South Main St., Suite 402  
P.O. Box 6067  
Providence, RI 02940-6067



Steven A. Minicucci, Esq.  
Calvino Law Associates  
373 Elmwood Avenue  
Providence, RI 02907

Ralph J. Monaco, Esq.  
Conway & Londregan  
38 Huntington Street  
P.O. Box 1351  
New London, CT 06320-6111

James T. Murphy, Esq., Esq  
Kelly N. Michels, Esq.  
Hanson, Curran, LLP  
146 Westminster Street  
Providence, RI 02903

Oleg Nikolyszyn, Esq.  
155 South Main St., Suite 303  
Providence, RI 02903

Mark T. Nugent, Esq.  
Paul V. Sullivan, Esq.  
Morrison, Mahoney & Miller  
One Providence Washington Plaza  
Providence, RI 02903

J. Renn Olenn, Esq.  
Olenn & Penza, LLP  
530 Greenwich Avenue  
Warwick, RI 02886

Charles N. Redihan, Jr., Esq.  
Kiernan, Plunkett & Redihan  
91 Friendship Street  
Providence, RI 02903

James A. Ruggieri, Esq.  
Higgins, Cavanagh & Cooney  
The Hay Building  
123 Dyer Street  
Providence, RI 02903-3987

Christopher L. Russo, Esq.  
Kirshenbaum & Kirshenbaum  
888 Reservoir Avenue  
Cranston, RI 02910

Randall L. Souza, Esq.  
Nixon Peabody, LLP  
One Citizens Plaza, Suite 700  
Providence, RI 02903

Michael A. St. Pierre, Esq.  
Revens, Revens & St. Pierre, P.C.  
946 Centerville Road  
Warwick, RI 02886

Mark D. Tourgee, Esq.  
Timothy A. Williamson, Esq.  
Inman & Tourgee  
1193 Tlogue Avenue  
Coventry, RI 02816

Max Wistow, Esq.  
Wistow & Baryllick, Inc.  
61 Weybosset Street  
Providence, RI 02903-2824

**MEDIA**

Martha Bebinger  
WRNI  
One Union Street  
Providence, RI 02903

Tracy Breton  
Providence Journal  
75 Fountain Street  
Providence, RI 02903

Sean Daly  
WPRI  
25 Catamore Boulevard  
East Providence, RI 02914

Brooke Donald  
The Associated Press  
10 Dorrance Street  
Providence, RI 02903

Delia Goncalves  
WPRI  
25 Catamore Boulevard  
East Providence, RI 02914

Laurie Johnson  
WPRO News  
1502 Wampanoag Trail  
East Providence, RI 02915

Kelley McGee  
WJAR News  
23 Kenney Drive  
Cranston, RI 02920

Kathleen A. D. Laro



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
**SUBPOENA**  
 SUPERIOR COURT

☒ PROVIDENCE/BRISTOL

☐ KENT

☐ WASHINGTON

☐ NEWPORT

1. IN RE: THE STATION FIRE IN WEST WARWICK  
 VS.

2. CASE NO. MP NO. 03-1326  
 MP NO. 03-1346  
 MP NO. 03-1431

Anheuser-Busch, Incorporated  
 TO One Busch Place, St. Louis, MO 63118

☐ YOU ARE HEREBY COMMANDED to appear in the Superior Court for the above County on \_\_\_\_\_ to testify in the above entitled action [and bring with you: \_\_\_\_\_ DATE \_\_\_\_\_]

LOCATION OF COURT \_\_\_\_\_

COURTROOM# \_\_\_\_\_

DATE \_\_\_\_\_

TIME \_\_\_\_\_

☒ YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above entitled action.

COOLEY MANTON JONES LLP  
 One Center Place, Providence, RI 02903  
 LOCATION OF DEPOSITION \_\_\_\_\_

AUGUST 14, 2003  
 10:00 a.m.  
 DATE AND TIME \_\_\_\_\_

☒ YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects):  
 SEE EXHIBIT A.

DOCUMENTS/OBJECTS  
 COOLEY MANTON JONES LLP  
 One Center Place, Providence, RI 02903  
 LOCATION \_\_\_\_\_

AUGUST 14, 2003  
 DATE \_\_\_\_\_

ROOM# \_\_\_\_\_

10:00 a.m.  
 TIME \_\_\_\_\_

☐ YOU ARE COMMANDED to produce and permit inspection of the following premises at the date and time specified below.

LOCATION \_\_\_\_\_

DATE \_\_\_\_\_

7/29/03  
 A True Copy Attest  
 Michael F. Tabacco  
 Michael F. Tabacco  
 COE STATE #6109

ROOM# \_\_\_\_\_

TIME \_\_\_\_\_

## Rule 45. Superior Court Rules of Civil Procedure, Parts C &amp; D

## (c) Protection of Persons Subject to Subpoenas.

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction, which may include, but is not limited to, lost earnings and a reasonable attorney's fee.

(2)(A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of the subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy the materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to their person commanded to produce, move at any time for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an office of a party from significant expense resulting from the inspection and copying commanded.

(3)(A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it

- (i) fails to allow reasonable time for compliance;
- (ii) requires disclosure of privileged or other protected matter and no exception or waiver applies, or
- (iii) subjects a person to undue burden.

(B) If a subpoena

- (i) requires disclosure of a trade secret or other confidential research, development, or commercial information or
- (ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonable compensated, the court may order appearance or production only upon specified conditions.

## (d) Duties in Responding to Subpoena.

(1) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

(2) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

STATE OF RHODE ISLAND  
PROVIDENCE, SC.

SUPERIOR COURT

IN RE: THE STATION FIRE IN : M.P. NO. 03-1326  
WEST WARWICK : M.P. NO. 03-1346  
: M.P. NO. 03-1431

RECEIVED

JUL 29 2003

VETTER & WHITE


NOTICE TO TAKE DEPOSITION

DEPONENT: Anheuser-Busch, Incorporated  
One Busch Place, St. Louis, MO 63118

DATE: Thursday, August 14, 2003  
TIME: 10:00 a.m.

PLEASE TAKE NOTICE that pursuant to R.C.P. 26, the attorney for petitioners in the above-captioned matter will take the deposition of the above-named individual on oral examination, which examination will continue from day to day until completed, the same to commence on the date and time above stated at the offices of COOLEY MANION JONES LLP, One Center Place, Providence, Rhode Island, before a Notary Public duly commissioned in the State of Rhode Island.

PLEASE TAKE FURTHER NOTICE that a subpoena duces tecum will issue in the form annexed hereto.

  
\_\_\_\_\_  
Patrick T. Jones (6636)  
COOLEY MANION JONES LLP  
One Center Place  
Providence, RI 02903  
(401) 273-0800

DATED: July 28, 2003

Anheuser-Busch

**SCHEDULE "A"**

1. All contracts or agreements in effect on February 20, 2003 between Anheuser-Busch and McLaughlin & Moran that refer or relate to advertising, distribution or marketing of Anheuser-Busch products in Rhode Island.
2. To the extent not produced in response to request number 1, above, all documents which refer or relate to the terms or conditions for authorized use of the Anheuser-Busch name or the name and/or logo of its products in connection with the sponsorship or promotion of any concert or event in Rhode Island, applicable as of February 20, 2003.
3. All documents which refer or relate to the sale and/or delivery of any Anheuser-Busch product to The Station in West Warwick, Rhode Island on February 20, 2003.
4. All documents which refer or relate to the promotion, sponsorship and/or authorized use of the Anheuser-Busch or Budweiser name or logo in connection with any Great White concert or performance during the period of January 1, 2002 to the present.
5. All documents which refer or relate to the knowledge of Anheuser-Busch, its agents, servants and employees, of Great White's use of pyrotechnics from 1995 to the present.
6. All documents which refer or relate to the use of pyrotechnics at any events where Anheuser-Busch sponsors or promotes or authorizes the use of its name or its products' names or logos from January 1, 2000 to the present.
7. All documents which refer or relate to the process or procedure by which Anheuser-Busch considered and then authorized the use of the Budweiser name and logo by The Station and Great White in connection with the Great White concert of February 20, 2003.
8. All correspondence between Anheuser-Busch and any of McLaughlin & Moran, Great White, Manic Music Management, Inc., Paul Woolnough, Knight Records, Derco, LLC, Jeffrey Dederian, Michael Dederian, or any persons acting on behalf of the above, relating to the Great White concert tour of 2002/2003.
9. All documents which refer or relate to the use of the Anheuser-Busch name or logo, or the name or logo of Anheuser-Busch products, in connection with the promotion, advertising or sponsorship of any event or concert at The Station prior to February 20, 2003.

10. All contracts of indemnity to which Anheuser-Busch is a party which may apply to claims arising out of the catastrophic fire at The Station on February 20, 2003.
11. All contracts of insurance which may respond to any claims asserted against Anheuser-Busch arising out of the catastrophic fire at The Station on February 20, 2003.



CERTIFICATION

I hereby certify that on the 20<sup>th</sup> day of July, 2003, an exact copy of the within document was mailed to:

Thomas C. Angelone, Esq.  
Hodosh Spinella & Angelone PC  
One Turks Head Place, Suite 1050  
Providence, RI 02903

Stephen E. Breggia, Esquire  
Breggia, Bowen & Grande  
395 Smith Street  
Providence, RI 02908-3734

Brian R. Cunha, Esq.  
Law Offices of Brian Cunha & Associates  
904 Broadway  
East Providence, RI 02914

Anthony F. DeMarco, Esq.  
Reynolds, DeMarco & Boland, Ltd.  
170 Westminster St., Suite 200  
Providence, RI 02903-2101

Marc DeSisto, Esquire  
DeSisto Law  
211 Angel Street  
P.O. Box 2563  
Providence, RI 02906-2563

Curtis R. Diedrich, Esq.  
Edward T. Hinchey, Esq.  
Sloane & Walsh, LLP  
3 Center Plaza  
Boston, MA 02108

Christopher C. Fallon, Jr., Esq.  
Cozen O'Connor  
1900 Market Street  
Philadelphia, PA 19103-3508

Joyce A. Faraone, Esq.  
400 Reservoir Ave., Suite 3G  
Providence, RI 02907-3565

William A. Filippo, Esq.  
Calvino Law Associates  
373 Elmwood Avenue  
Providence, RI 02907

James Howe, Esq.  
215 Broadway  
Providence, RI 02903

Scott Hubbell, Esq.  
Summers Law Office  
P.O. Box 306  
Franklin, MA 02038-0306

Stefanie Larivee-DiMario, Esq.  
215 Broadway  
Providence, RI 02903

Patrick C. Lynch, Attorney General  
Dept. of the Attorney General  
150 South Main Street  
Providence, RI 02903

Eva-Marie Mancuso, Esq.  
Hamel, Waxler, Allen & Collins  
387 Atwells Ave.  
Providence, RI 02909

Mark S. Mandell, Esq.  
Yvette M. Boisclair, Esq.  
Mandell, Schwartz & Boisclair, Ltd.  
One Park Row  
Providence, RI 02903

Daniel P. McKiernan, Esq.  
146 Westminster Street  
Providence, RI 02903

Donald A. Migliori, Esq.  
Motley Rice, LLC  
321 South Main St., Suite 402  
P.O. Box 6067  
Providence, RI 02940-6067

Steven A. Minicucci, Esq.  
Calvino Law Associates  
373 Elmwood Avenue  
Providence, RI 02907

Ralph J. Monaco, Esq.  
Conway & Londregan  
38 Huntington Street  
P.O. Box 1351  
New London, CT 06320-6111

James T. Murphy, Esq., Esq  
Kelly N. Michels, Esq.  
Hanson, Curran, LLP  
146 Westminster Street  
Providence, RI 02903

Oleg Nikolyszyn, Esq.  
155 South Main St., Suite 303  
Providence, RI 02903

Mark T. Nugent, Esq.  
Paul V. Sullivan, Esq.  
Morrison, Mahoney & Miller  
One Providence Washington Plaza  
Providence, RI 02903

J. Renn Olenn, Esq.  
Olenn & Penza, LLP  
530 Greenwich Avenue  
Warwick, RI 02886

Charles N. Redihan, Jr., Esq.  
Kiernan, Plunkett & Redihan  
91 Friendship Street  
Providence, RI 02903

James A. Ruggieri, Esq.  
Higgins, Cavanagh & Cooney  
The Hay Building  
123 Dyer Street  
Providence, RI 02903-3987

Christopher L. Russo, Esq.  
Kirshenbaum & Kirshenbaum  
888 Reservoir Avenue  
Cranston, RI 02910

Randall L. Souza, Esq.  
Nixon Peabody, LLP  
One Citizens Plaza, Suite 700  
Providence, RI 02903

Michael A. St. Pierre, Esq.  
Revens, Revens & St. Pierre, P.C.  
946 Centerville Road  
Warwick, RI 02886

Mark D. Tourgee, Esq.  
Timothy A. Williamson, Esq.  
Inman & Tourgee  
1193 Tiogue Avenue  
Coventry, RI 02816

Max Wistow, Esq.  
Wistow & Baryllick, Inc.  
61 Weybosset Street  
Providence, RI 02903-2824

**MEDIA**

Martha Bebinger  
WRNI  
One Union Street  
Providence, RI 02903

Tracy Breton  
Providence Journal  
75 Fountain Street  
Providence, RI 02903

Sean Daly  
WPRI  
25 Catamore Boulevard  
East Providence, RI 02914

Brooke Donald  
The Associated Press  
10 Dorrance Street  
Providence, RI 02903

Delia Goncalves  
WPRI  
25 Catamore Boulevard  
East Providence, RI 02914

Laurie Johnson  
WPRO News  
1502 Wampanoag Trail  
East Providence, RI 02915

Kelley McGee  
WJAR News  
23 Kenney Drive  
Cranston, RI 02920

Kathleen A. DeLargio

STATE OF RHODE ISLAND  
PROVIDENCE, SC.

SUPERIOR COURT

RECEIVED

JUL 29 2003

IN RE: THE STATION FIRE IN : M.P. NO. 03-1326  
WEST WARWICK : M.P. NO. 03-1346  
: M.P. NO. 03-1431

VETTER & WHITE

NOTICE TO TAKE DEPOSITION

DEPONENT: WHJY, Inc.

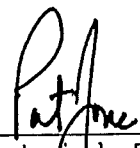
200 East Basse Road, San Antonio, TX 78209

DATE: Thursday, August 14, 2003

TIME: 12:00 noon

PLEASE TAKE NOTICE that pursuant to R.C.P. 26, the attorney for petitioners in the above-captioned matter will take the deposition of the above-named individual on oral examination, which examination will continue from day to day until completed, the same to commence on the date and time above stated at the offices of COOLEY MANION JONES LLP, One Center Place, Providence, Rhode Island, before a Notary Public duly commissioned in the State of Rhode Island.

PLEASE TAKE FURTHER NOTICE that a subpoena duces tecum will issue in the form annexed hereto.

  
\_\_\_\_\_  
Patrick T. Jones (6636)  
COOLEY MANION JONES LLP  
One Center Place  
Providence, RI 02903  
(401) 273-0800

DATED: July 28, 2003

WHJY, Inc.

**SCHEDULE "A"**

1. All documents which set forth the legal and operational relationship between WHJY, Inc. and Clear Channel Communications, Inc. as of February 20, 2003.
2. All documents in existence as of February 20, 2003 which refer or relate to the Great White concert at The Station of February 20, 2003.
3. All documents, to specifically include written text, audio tapes, discs, and all other electronic storage media, which contain the text of any advertisement for the Great White concert of February 20, 2003.
4. All documents which memorialize the date and time on which WHJY played on air, any advertisement or notice of the Great White concert at The Station of February 20, 2003.
5. All documents which memorialize any material placed or posted on WHJY's web site prior to and including February 20, 2003, relating to the Great White concert at The Station on February 20, 2003.
6. All documents which fully disclose the identities of each WHJY employee, agent or intern involved in the promotion or advertising of the Great White concert at The Station on February 20, 2003, including any employee physically present at The Station on February 20, 2003.
7. All documents generated on or prior to February 20, 2003 between WHJY and any of Jeffrey Dederian, Michael Dederian, Derco, Inc., the band known as Great White, Manic Music Management, Inc., McLaughlin & Moran, Anheuser-Busch, or any advertising or promotional agency relating to the Great White concert of February 20, 2003.
8. All documents generated prior to February 20, 2003 between WHJY and any of Jeffrey Dederian, Michael Dederian, Derco, Inc., its agents, servants or employees, the band known as Great White, Manic Music Management, Inc., McLaughlin & Moran, Anheuser-Busch, or any advertising or promotional agency relating to any concert at The Station from January 1, 2000 to February 20, 2003.
9. All documents which memorialize or reflect any expense incurred by WHJY in connection with the Great White concert at The Station of February 20, 2003.
10. All documents which memorialize or reflect any tickets provided to WHJY for the Great White concert of February 20, 2003.

11. All documents in the custody or control of WHJY which were in existence as of February 20, 2003 which refer or relate to WHJY, Anheuser-Busch, McLaughlin & Moran or Budweiser as a co-sponsor or co-promotor of the Great White concert of February 20, 2003.
12. All protocols, procedures or written guidelines in effect on February 20, 2003 which relate to WHJY's promotion or sponsorship of concerts.
13. All policies of insurance in effect as of February 20, 2003 which may respond to claims against WHJY arising out of the catastrophic fire at The Station on February 20, 2003.
14. All indemnity agreements to which WHJY, Inc. is a party which may apply to any claims asserted against WHJY arising out of the catastrophic fire at The Station on February 20, 2003.
15. All documents which existed as of February 20, 2003 which refer or relate to or memorialize any investigation or inspection done by WHJY or its agents and employees, with respect to the suitability of The Station as a venue for a concert to be promoted or sponsored by WHJY.
16. All documents which memorialize, refer or relate to WHJY's knowledge as of February 20, 2003, of the legal capacity for the Great White concert at The Station, the anticipated number of patrons to be attending that concert and/or the number of tickets sold for said concert.
17. All documents which refer or relate to any knowledge of WHJY, its agents, servants or employees of the use of pyrotechnics by the band Great White prior to February 20, 2003.



**CERTIFICATION**

I hereby certify that on the 28<sup>th</sup> day of July, 2003, an exact copy of the within document was mailed to:

Thomas C. Angelone, Esq.  
Hodosh Spinella & Angelone PC  
One Turks Head Place, Suite 1050  
Providence, RI 02903

Stephen E. Breggia, Esquire  
Breggia, Bowen & Grande  
395 Smith Street  
Providence, RI 02908-3734

Brian R. Cunha, Esq.  
Law Offices of Brian Cunha & Associates  
904 Broadway  
East Providence, RI 02914

Anthony F. DeMarco, Esq.  
Reynolds, DeMarco & Boland, Ltd.  
170 Westminster St., Suite 200  
Providence, RI 02903-2101

Marc DeSisto, Esquire  
DeSisto Law  
211 Angel Street  
P.O. Box 2563  
Providence, RI 02906-2563

Curtis R. Diedrich, Esq.  
Edward T. Hinchey, Esq.  
Sloane & Walsh, LLP  
3 Center Plaza  
Boston, MA 02108

Christopher C. Fallon, Jr., Esq.  
Cozen O'Connor  
1900 Market Street  
Philadelphia, PA 19103-3508

Joyce A. Faraone, Esq.  
400 Reservoir Ave., Suite 3G  
Providence, RI 02907-3565

William A. Filippo, Esq.  
Calvino Law Associates  
373 Elmwood Avenue  
Providence, RI 02907

James Howe, Esq.  
215 Broadway  
Providence, RI 02903

Scott Hubbell, Esq.  
Summers Law Office  
P.O. Box 306  
Franklin, MA 02038-0306

Stefanie Larivee-DiMario, Esq.  
215 Broadway  
Providence, RI 02903

Patrick C. Lynch, Attorney General  
Dept. of the Attorney General  
150 South Main Street  
Providence, RI 02903

Eva-Marie Mancuso, Esq.  
Hamel, Waxler, Allen & Collins  
387 Atwells Ave.  
Providence, RI 02909

Mark S. Mandell, Esq.  
Yvette M. Boisclair, Esq.  
Mandell, Schwartz & Boisclair, Ltd.  
One Park Row  
Providence, RI 02903

Daniel P. McKiernan, Esq.  
146 Westminster Street  
Providence, RI 02903

Donald A. Migliori, Esq.  
Motley Rice, LLC  
321 South Main St., Suite 402  
P.O. Box 6067  
Providence, RI 02940-6067

Steven A. Minicucci, Esq.  
Calvino Law Associates  
373 Elmwood Avenue  
Providence, RI 02907

Ralph J. Monaco, Esq.  
Conway & Londregan  
38 Huntington Street  
P.O. Box 1351  
New London, CT 06320-6111

James T. Murphy, Esq., Esq  
Kelly N. Michels, Esq.  
Hanson, Curran, LLP  
146 Westminster Street  
Providence, RI 02903

Oleg Nikolyszyn, Esq.  
155 South Main St., Suite 303  
Providence, RI 02903

Mark T. Nugent, Esq.  
Paul V. Sullivan, Esq.  
Morrison, Mahoney & Miller  
One Providence Washington Plaza  
Providence, RI 02903

J. Renn Olenn, Esq.  
Olenn & Penza, LLP  
530 Greenwich Avenue  
Warwick, RI 02886

Charles N. Redihan, Jr., Esq.  
Kiernan, Plunkett & Redihan  
91 Friendship Street  
Providence, RI 02903

James A. Ruggieri, Esq.  
Higgins, Cavanagh & Cooney  
The Hay Building  
123 Dyer Street  
Providence, RI 02903-3987

Christopher L. Russo, Esq.  
Kirshenbaum & Kirshenbaum  
888 Reservoir Avenue  
Cranston, RI 02910

Randall L. Souza, Esq.  
Nixon Peabody, LLP  
One Citizens Plaza, Suite 700  
Providence, RI 02903

Michael A. St. Pierre, Esq.  
Revens, Revens & St. Pierre, P.C.  
946 Centerville Road  
Warwick, RI 02886

Mark D. Tourgee, Esq.  
Timothy A. Williamson, Esq.  
Inman & Tourgee  
1193 Tiogue Avenue  
Coventry, RI 02816

Max Wistow, Esq.  
Wistow & Baryllick, Inc.  
61 Weybosset Street  
Providence, RI 02903-2824

MEDIA

Martha Bebinger  
WRNI  
One Union Street  
Providence, RI 02903

Tracy Breton  
Providence Journal  
75 Fountain Street  
Providence, RI 02903

Sean Daly  
WPRI  
25 Catamore Boulevard  
East Providence, RI 02914

Brooke Donald  
The Associated Press  
10 Dorrance Street  
Providence, RI 02903

Delia Goncalves  
WPRI  
25 Catamore Boulevard  
East Providence, RI 02914

Laurie Johnson  
WPRO News  
1502 Wampanoag Trail  
East Providence, RI 02915

Kelley McGee  
WJAR News  
23 Kenney Drive  
Cranston, RI 02920

Kathleen A. DeFazio

STATE OF RHODE ISLAND  
PROVIDENCE, SC.

SUPERIOR COURT

RECEIVED

IN RE: THE STATION FIRE IN : M.P. NO. 03-1326  
WEST WARWICK : M.P. NO. 03-1346  
: M.P. NO. 03-1431

JUL 29 2003

VETTER & WHITE


NOTICE TO TAKE DEPOSITION

DEPONENT: Manic Music Management, Inc.  
17337 Ventura Boulevard, Suite 218, Encino, CA 91316

DATE: Thursday, August 14, 2003  
TIME: 12:30 p.m.

PLEASE TAKE NOTICE that pursuant to R.C.P. 26, the attorney for petitioners in the above-captioned matter will take the deposition of the above-named individual on oral examination, which examination will continue from day to day until completed, the same to commence on the date and time above stated at the offices of COOLEY MANION JONES LLP, One Center Place, Providence, Rhode Island, before a Notary Public duly commissioned in the State of Rhode Island.

PLEASE TAKE FURTHER NOTICE that a subpoena duces tecum will issue in the form annexed hereto.

  
\_\_\_\_\_  
Patrick T. Jones (6636)  
COOLEY MANION JONES LLP  
One Center Place  
Providence, RI 02903  
(401) 273-0800

DATED: July 28, 2003

Manic Music  
Management, Inc.

**SCHEDULE "A"**

1. All contracts or agreements by and between Manic Music Management and the band known as Great White, its agents, servants and employees, in effect on February 20, 2003.
2. Any and all documents which refer or relate to knowledge of Manic Music Management, its agents, servants and employees, of Great White's purchase of and/or use of pyrotechnics at concerts prior to and including February 20, 2003.
3. All contracts and agreements between Manic Music Management and any other person or entity relating to the Great White concert of February 20, 2003 at The Station.
4. All contracts or agreements between Manic Music Management and any other person or entity relating to sponsorship, promotion or advertisement of the Great White concert tour of 2002/2003.
5. All policies of insurance in effect as of February 20, 2003 which may respond to claims against Manic Music Management arising out of catastrophic fire at The Station on February 20, 2003.
6. All indemnity agreements to which Manic Music Management is a party which may apply to any claims asserted against Manic Music Management arising out of catastrophic fire at The Station on February 20, 2003.
7. All documents which refer or relate to the identity of the owner or lessor, and all contractual arrangements concerning the tour bus used by Great White on February 20, 2003.

CERTIFICATION

I hereby certify that on the 28<sup>th</sup> day of July, 2003, an exact copy of the within documents were mailed to:

Thomas C. Angelone, Esq.  
Hodosh Spinella & Angelone PC  
One Turks Head Place, Suite 1050  
Providence, RI 02903

Stephen E. Breggia, Esquire  
Breggia, Bowen & Grande  
395 Smith Street  
Providence, RI 02908-3734

Brian R. Cunha, Esq.  
Law Offices of Brian Cunha & Associates  
904 Broadway  
East Providence, RI 02914

Anthony F. DeMarco, Esq.  
Reynolds, DeMarco & Boland, Ltd.  
170 Westminster St., Suite 200  
Providence, RI 02903-2101

Marc DeSisto, Esquire  
DeSisto Law  
211 Angel Street  
P.O. Box 2563  
Providence, RI 02906-2563

Curtis R. Diedrich, Esq.  
Edward T. Hinchey, Esq.  
Sloane & Walsh, LLP  
3 Center Plaza  
Boston, MA 02108

Christopher C. Fallon, Jr., Esq.  
Cozen O'Connor  
1900 Market Street  
Philadelphia, PA 19103-3508

Joyce A. Faraone, Esq.  
400 Reservoir Ave., Suite 3G  
Providence, RI 02907-3565



William A. Filippo, Esq.  
Calvino Law Associates  
373 Elmwood Avenue  
Providence, RI 02907

James Howe, Esq.  
215 Broadway  
Providence, RI 02903

Scott Hubbell, Esq.  
Summers Law Office  
P.O. Box 306  
Franklin, MA 02038-0306

Stefanie Larivee-DiMario, Esq.  
215 Broadway  
Providence, RI 02903

Patrick C. Lynch, Attorney General  
Dept. of the Attorney General  
150 South Main Street  
Providence, RI 02903

Eva-Marie Mancuso, Esq.  
Hamel, Waxler, Allen & Collins  
387 Atwells Ave.  
Providence, RI 02909

Mark S. Mandell, Esq.  
Yvette M. Boisclair, Esq.  
Mandell, Schwartz & Boisclair, Ltd.  
One Park Row  
Providence, RI 02903

Daniel P. McKiernan, Esq.  
146 Westminster Street  
Providence, RI 02903

Donald A. Migliori, Esq.  
Motley Rice, LLC  
321 South Main St., Suite 402  
P.O. Box 6067  
Providence, RI 02940-6067

Steven A. Minicucci, Esq.  
Calvino Law Associates  
373 Elmwood Avenue  
Providence, RI 02907

Ralph J. Monaco, Esq.  
Conway & Londregan  
38 Huntington Street  
P.O. Box 1351  
New London, CT 06320-6111

James T. Murphy, Esq., Esq  
Kelly N. Michels, Esq.  
Hanson, Curran, LLP  
146 Westminster Street  
Providence, RI 02903

Oleg Nikolyszyn, Esq.  
155 South Main St., Suite 303  
Providence, RI 02903

Mark T. Nugent, Esq.  
Paul V. Sullivan, Esq.  
Morrison, Mahoney & Miller  
One Providence Washington Plaza  
Providence, RI 02903

J. Renn Olenn, Esq.  
Olenn & Penza, LLP  
530 Greenwich Avenue  
Warwick, RI 02886

Charles N. Redihan, Jr., Esq.  
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91 Friendship Street  
Providence, RI 02903

James A. Ruggieri, Esq.  
Higgins, Cavanagh & Cooney  
The Hay Building  
123 Dyer Street  
Providence, RI 02903-3987

Christopher L. Russo, Esq.  
Kirshenbaum & Kirshenbaum  
888 Reservoir Avenue  
Cranston, RI 02910

Randall L. Souza, Esq.  
Nixon Peabody, LLP  
One Citizens Plaza, Suite 700  
Providence, RI 02903

Michael A. St. Pierre, Esq.  
Revens, Revens & St. Pierre, P.C.  
946 Centerville Road  
Warwick, RI 02886

Mark D. Tourgee, Esq.  
Timothy A. Williamson, Esq.  
Inman & Tourgee  
1193 Tiogue Avenue  
Coventry, RI 02816

Max Wistow, Esq.  
Wistow & Baryllick, Inc.  
61 Weybosset Street  
Providence, RI 02903-2824

#### **MEDIA**

Martha Bebinger  
WRNI  
One Union Street  
Providence, RI 02903

Tracy Breton  
Providence Journal  
75 Fountain Street  
Providence, RI 02903

Sean Daly  
WPRI  
25 Catamore Boulevard  
East Providence, RI 02914

Brooke Donald  
The Associated Press  
10 Dorrance Street  
Providence, RI 02903

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25 Catamore Boulevard  
East Providence, RI 02914

Laurie Johnson  
WPRO News  
1502 Wampanoag Trail  
East Providence, RI 02915

Kelley McGee  
WJAR News  
23 Kenney Drive  
Cranston, RI 02920

Anthony A. DeLario

STATE OF RHODE ISLAND  
PROVIDENCE, SC.

SUPERIOR COURT

IN RE: THE STATION FIRE IN : M.P. NO. 03-1326  
WEST WARWICK : M.P. NO. 03-1346  
: M.P. NO. 03-1431

RECEIVED

JUL 29 2003

VETTER & WHITE

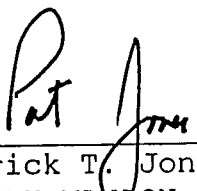
NOTICE TO TAKE DEPOSITION

DEPONENT: Strawberries, Inc.  
c/o CT Corporation System  
123 Dyer Street, Providence, RI 02903

DATE: Thursday, August 14, 2003  
TIME: 11:30 a.m.

PLEASE TAKE NOTICE that pursuant to R.C.P. 26, the attorney for petitioners in the above-captioned matter will take the deposition of the above-named individual on oral examination, which examination will continue from day to day until completed, the same to commence on the date and time above stated at the offices of COOLEY MANION JONES LLP, One Center Place, Providence, Rhode Island, before a Notary Public duly commissioned in the State of Rhode Island.

PLEASE TAKE FURTHER NOTICE that a subpoena duces tecum will issue in the form annexed hereto.

  
\_\_\_\_\_  
Patrick T. Jones (6636)  
COOLEY MANION JONES LLP  
One Center Place  
Providence, RI 02903  
(401) 273-0800

DATED: July 28, 2003

Strawberries  
Rhode Island, Inc.

**SCHEDULE "A"**

All documents which memorialize, refer or relate to the sale of tickets by Strawberries, Inc. for the Great White concert at The Station in West Warwick, Rhode Island, for its concert of February 20, 2003, including without limitation all authorizations for the sale of said tickets by any person or entity, the number of tickets authorized to be sold, the number of tickets sold, the premium charged by Strawberries in connection with the sale of each ticket, Strawberries knowledge, as of February 20, 2003, of the legal capacity of The Station for the Great White concert of February 20, 2003, and any advertisement, in any form or media, for the Great White concert of February 20, 2003.

CERTIFICATION

I hereby certify that on the 28<sup>th</sup> day of July, 2003, an exact copy of the within document was mailed to:

Thomas C. Angelone, Esq.  
Hodosh Spinella & Angelone PC  
One Turks Head Place, Suite 1050  
Providence, RI 02903

Stephen E. Breggia, Esquire  
Breggia, Bowen & Grande  
395 Smith Street  
Providence, RI 02908-3734

Brian R. Cunha, Esq.  
Law Offices of Brian Cunha & Associates  
904 Broadway  
East Providence, RI 02914

Anthony F. DeMarco, Esq.  
Reynolds, DeMarco & Boland, Ltd.  
170 Westminster St., Suite 200  
Providence, RI 02903-2101

Marc DeSisto, Esquire  
DeSisto Law  
211 Angel Street  
P.O. Box 2563  
Providence, RI 02906-2563

Curtis R. Diedrich, Esq.  
Edward T. Hinchey, Esq.  
Sloane & Walsh, LLP  
3 Center Plaza  
Boston, MA 02108

Christopher C. Fallon, Jr., Esq.  
Cozen O'Connor  
1900 Market Street  
Philadelphia, PA 19103-3508

Joyce A. Faraone, Esq.  
400 Reservoir Ave., Suite 3G  
Providence, RI 02907-3565

William A. Filippo, Esq.  
Calvino Law Associates  
373 Elmwood Avenue  
Providence, RI 02907

James Howe, Esq.  
215 Broadway  
Providence, RI 02903

Scott Hubbell, Esq.  
Summers Law Office  
P.O. Box 306  
Franklin, MA 02038-0306

Stefanie Larivee-DiMario, Esq.  
215 Broadway  
Providence, RI 02903

Patrick C. Lynch, Attorney General  
Dept. of the Attorney General  
150 South Main Street  
Providence, RI 02903

Eva-Marie Mancuso, Esq.  
Hamel, Waxler, Allen & Collins  
387 Atwells Ave.  
Providence, RI 02909

Mark S. Mandell, Esq.  
Yvette M. Boisclair, Esq.  
Mandell, Schwartz & Boisclair, Ltd.  
One Park Row  
Providence, RI 02903

Daniel P. McKiernan, Esq.  
146 Westminster Street  
Providence, RI 02903

Donald A. Migliori, Esq.  
Motley Rice, LLC  
321 South Main St., Suite 402  
P.O. Box 6067  
Providence, RI 02940-6067



Steven A. Minicucci, Esq.  
Calvino Law Associates  
373 Elmwood Avenue  
Providence, RI 02907

Ralph J. Monaco, Esq.  
Conway & Londregan  
38 Huntington Street  
P.O. Box 1351  
New London, CT 06320-6111

James T. Murphy, Esq., Esq  
Kelly N. Michels, Esq.  
Hanson, Curran, LLP  
146 Westminster Street  
Providence, RI 02903

Oleg Nikolyszyn, Esq.  
155 South Main St., Suite 303  
Providence, RI 02903

Mark T. Nugent, Esq.  
Paul V. Sullivan, Esq.  
Morrison, Mahoney & Miller  
One Providence Washington Plaza  
Providence, RI 02903

J. Renn Olenn, Esq.  
Olenn & Penza, LLP  
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Warwick, RI 02886

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Providence, RI 02903

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Higgins, Cavanagh & Cooney  
The Hay Building  
123 Dyer Street  
Providence, RI 02903-3987

Christopher L. Russo, Esq.  
Kirshenbaum & Kirshenbaum  
888 Reservoir Avenue  
Cranston, RI 02910

Randall L. Souza, Esq.  
Nixon Peabody, LLP  
One Citizens Plaza, Suite 700  
Providence, RI 02903

Michael A. St. Pierre, Esq.  
Revens, Revens & St. Pierre, P.C.  
946 Centerville Road  
Warwick, RI 02886

Mark D. Tourgee, Esq.  
Timothy A. Williamson, Esq.  
Inman & Tourgee  
1193 Tiogue Avenue  
Coventry, RI 02816

Max Wistow, Esq.  
Wistow & Barylick, Inc.  
61 Weybosset Street  
Providence, RI 02903-2824

#### MEDIA

Martha Bebinger  
WRNI  
One Union Street  
Providence, RI 02903

Tracy Breton  
Providence Journal  
75 Fountain Street  
Providence, RI 02903

Sean Daly  
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East Providence, RI 02914

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10 Dorrance Street  
Providence, RI 02903

Delia Goncalves  
WPRI  
25 Catamore Boulevard  
East Providence, RI 02914

Laurie Johnson  
WPRO News  
1502 Wampanoag Trail  
East Providence, RI 02915

Kelley McGee  
WJAR News  
23 Kenney Drive  
Cranston, RI 02920

Kathleen A. DeLario

STATE OF RHODE ISLAND  
PROVIDENCE, SC.

SUPERIOR COURT

RECEIVED

JUL 29 2003

IN RE: THE STATION FIRE IN : M.P. NO. 03-1326  
WEST WARWICK : M.P. NO. 03-1346  
: M.P. NO. 03-1431

VETTER & WHITE


NOTICE TO TAKE DEPOSITION

DEPONENT: Derco LLC  
42 Tern Road, Narragansett, RI 02882

DATE: Thursday, August 14, 2003  
TIME: 10:30 a.m.

PLEASE TAKE NOTICE that pursuant to R.C.P. 26, the attorney for petitioners in the above-captioned matter will take the deposition of the above-named individual on oral examination, which examination will continue from day to day until completed, the same to commence on the date and time above stated at the offices of COOLEY MANION JONES LLP, One Center Place, Providence, Rhode Island, before a Notary Public duly commissioned in the State of Rhode Island.

PLEASE TAKE FURTHER NOTICE that a subpoena duces tecum will issue in the form annexed hereto.

  
\_\_\_\_\_  
Patrick T. Jones (6636)  
COOLEY MANION JONES LLP  
One Center Place  
Providence, RI 02903  
(401) 273-0800

DATED: July 28, 2003

Derco LLC

**SCHEDULE "A"**

1. All documents relating to the purchase and/or installation of any product, including but not limited to foam, affixed to any structural surface at The Station from September 1, 2000 up to and including the present.
2. All documents referring or relating to any renovation, addition or repair performed on the structure of The Station by Derco or by its employees or by independent contractors at its direction, from September 1, 2000 up to and including the present.
3. All documents which refer or relate to the intended or lawful capacity of The Station at any time, including without limitation on February 20, 2003, from September 1, 2000 to and including the present.
4. All documents which refer or relate to promotion or sponsorship by WHJY-FM of the Great White concert at The Station on February 20, 2003.
5. All documents which refer or relate to promotion or sponsorship by WHJY FM of any concert or promotion at The Station from September 1, 2000 to and including the present.
6. All documents which refer or relate to promotion or sponsorship by Anheuser-Busch and/or Budweiser of the Great White concert at The Station on February 20, 2003.
7. All documents which refer or relate to promotion or sponsorship by Anheuser-Busch and/or Budweiser of any concert or promotion at The Station from September 1, 2000 to and including the present.
8. All documents which refer or relate to promotion or sponsorship by McLaughlin & Moran of the Great White concert at The Station on February 20, 2003.
9. All documents which refer or relate to promotion or sponsorship by McLaughlin & Moran of any concert or promotion at The Station from September 1, 2000 to and including the present.
10. All documents which refer or relate to promotion or sponsorship by any other person or entity of the Great White concert at The Station on February 20, 2003.
11. All documents which refer or relate to promotion or sponsorship by any other person or entity of any concert or promotion at The Station from September 1, 2000 to and including the present.

12. Any and all documents referring or relating to the use of pyrotechnics which documents or were in the custody or control of Derco as of February 20, 2003.
13. All documents which memorialize, refer or relate to any and all inspections of The Station by any local or state inspector.
14. Any and all documents which refer or relate to any advertising, in any medium or form, for the Great White concert of February 20, 2003 at The Station.
15. All documents, including without limitation, correspondence or agreements, by and between Derco LLC, its agents, servants or employees, and any of Shell Oil Company, Motiva Enterprises LLC, Post Road Shell, their agents, servants or employees referring or relating to concerts or commercial activities at The Station, including without limitation, the Great White concert of February 20, 2003.
16. All policies of insurance which may respond to claims against Derco LLC, its agents, servants or employees, arising out of catastrophic fire at The Station on February 20, 2003.
17. All contracts and agreements of indemnity which may apply to claims against Derco LLC, its agents, servants or employees, arising out of catastrophic fire at The Station on February 20, 2003.
18. All documents which refer or relate to any agreement or transactions with any ticket agency or ticket broker in connection with the Great White concert at The Station on February 20, 2003.
19. All documents which memorialize or refer or relate to the purchase and/or sale by Derco, its owners, agents, servants or employees, of a gas station business, a/k/a Post Road Shell, on Post Road in North Kingstown, RI.
20. All documents which refer or relate to the sale of tickets for or advertisement of concerts or events at The Station in W. Warwick, RI, including the Great White concert on February 20, 2003.
21. All contracts or agreements between any persons or entities regarding the performance of the band known as Great White.

**CERTIFICATION**

I hereby certify that on the 28<sup>th</sup> day of July, 2003, an exact copy of the within document was mailed to:

Thomas C. Angelone, Esq.  
Hodosh Spinella & Angelone PC  
One Turks Head Place, Suite 1050  
Providence, RI 02903

Stephen E. Breggia, Esquire  
Breggia, Bowen & Grande  
395 Smith Street  
Providence, RI 02908-3734

Brian R. Cunha, Esq.  
Law Offices of Brian Cunha & Associates  
904 Broadway  
East Providence, RI 02914

Anthony F. DeMarco, Esq.  
Reynolds, DeMarco & Boland, Ltd.  
170 Westminster St., Suite 200  
Providence, RI 02903-2101

Marc DeSisto, Esquire  
DeSisto Law  
211 Angel Street  
P.O. Box 2563  
Providence, RI 02906-2563

Curtis R. Diedrich, Esq.  
Edward T. Hinchey, Esq.  
Sloane & Walsh, LLP  
3 Center Plaza  
Boston, MA 02108

Christopher C. Fallon, Jr., Esq.  
Cozen O'Connor  
1900 Market Street  
Philadelphia, PA 19103-3508

Joyce A. Faraone, Esq.  
400 Reservoir Ave., Suite 3G  
Providence, RI 02907-3565

William A. Filippo, Esq.  
Calvino Law Associates  
373 Elmwood Avenue  
Providence, RI 02907

James Howe, Esq.  
215 Broadway  
Providence, RI 02903

Scott Hubbell, Esq.  
Summers Law Office  
P.O. Box 306  
Franklin, MA 02038-0306

Stefanie Larivee-DiMario, Esq.  
215 Broadway  
Providence, RI 02903

Patrick C. Lynch, Attorney General  
Dept. of the Attorney General  
150 South Main Street  
Providence, RI 02903

Eva-Marie Mancuso, Esq.  
Hamel, Waxler, Allen & Collins  
387 Atwells Ave.  
Providence, RI 02909

Mark S. Mandell, Esq.  
Yvette M. Boisclair, Esq.  
Mandell, Schwartz & Boisclair, Ltd.  
One Park Row  
Providence, RI 02903

Daniel P. McKiernan, Esq.  
146 Westminster Street  
Providence, RI 02903

Donald A. Migliori, Esq.  
Motley Rice, LLC  
321 South Main St., Suite 402  
P.O. Box 6067  
Providence, RI 02940-6067



Steven A. Minicucci, Esq.  
Calvino Law Associates  
373 Elmwood Avenue  
Providence, RI 02907

Ralph J. Monaco, Esq.  
Conway & Londregan  
38 Huntington Street  
P.O. Box 1351  
New London, CT 06320-6111

James T. Murphy, Esq., Esq  
Kelly N. Michels, Esq.  
Hanson, Curran, LLP  
146 Westminster Street  
Providence, RI 02903

Oleg Nikolyszyn, Esq.  
155 South Main St., Suite 303  
Providence, RI 02903

Mark T. Nugent, Esq.  
Paul V. Sullivan, Esq.  
Morrison, Mahoney & Miller  
One Providence Washington Plaza  
Providence, RI 02903

J. Renn Olenn, Esq.  
Olenn & Penza, LLP  
530 Greenwich Avenue  
Warwick, RI 02886

Charles N. Redihan, Jr., Esq.  
Kiernan, Plunkett & Redihan  
91 Friendship Street  
Providence, RI 02903

James A. Ruggieri, Esq.  
Higgins, Cavanagh & Cooney  
The Hay Building  
123 Dyer Street  
Providence, RI 02903-3987

Christopher L. Russo, Esq.  
Kirshenbaum & Kirshenbaum  
888 Reservoir Avenue  
Cranston, RI 02910

Randall L. Souza, Esq.  
Nixon Peabody, LLP  
One Citizens Plaza, Suite 700  
Providence, RI 02903

Michael A. St. Pierre, Esq.  
Revens, Revens & St. Pierre, P.C.  
946 Centerville Road  
Warwick, RI 02886

Mark D. Tourgee, Esq.  
Timothy A. Williamson, Esq.  
Inman & Tourgee  
1193 Tiogue Avenue  
Coventry, RI 02816

Max Wistow, Esq.  
Wistow & Barylick, Inc.  
61 Weybosset Street  
Providence, RI 02903-2824

**MEDIA**

Martha Bebinger  
WRNI  
One Union Street  
Providence, RI 02903

Tracy Breton  
Providence Journal  
75 Fountain Street  
Providence, RI 02903

Sean Daly  
WPRI  
25 Catamore Boulevard  
East Providence, RI 02914

Brooke Donald  
The Associated Press  
10 Dorrance Street  
Providence, RI 02903

Delia Goncalves  
WPRI  
25 Catamore Boulevard  
East Providence, RI 02914

Laurie Johnson  
WPRO News  
1502 Wampanoag Trail  
East Providence, RI 02915

Kelley McGee  
WJAR News  
23 Kenney Drive  
Cranston, RI 02920

Kathleen A. Delaney